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"I will stand for my client's rights.  
I am a trial lawyer."  
-Ron Motley (1944-2013)

28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
o. 843.216.9000 f. 843.216.9450

**Joseph F. Rice**  
*Licensed in DC, SC*  
direct: 843.216.9159  
jrice@motleyrice.com

April 1, 2019

Via email to: [srb@mbfirm.com](mailto:srb@mbfirm.com)

Scott R. Bickford  
Martzell, Bickford & Centola  
338 Lafayette Street  
New Orleans, LA 70130

Re: National Prescription Opiate Litigation MDL No. 2804  
NAS in the Opioid MDL

Dear Scott,

I enjoyed meeting with you and Celeste Friday. I want to reiterate a few things that we discussed.

1. You and Celeste are authorized to work in the MDL on the NAS Committee Project that was assigned, which includes developing the ESI terms that you are proposing we use in CT2 Discovery and developing other general discovery tools that you believe should be used, including Requests for Admissions or 30(b)(6) Deposition topics that would be common benefit to all litigants that are addressing the NAS case, including all the municipalities in the MDL.
2. In addition, we discussed your group's belief that you have some damage models that should be considered. It is hard to know whether they are common benefit until we look at them, but please feel free to submit them. We will give them to our abatement experts to see if they are something viewed as appropriate relief while understanding we are not seeking individual damages for persons at this juncture.

Please stay in touch, and if you have any other questions feel free to call.

As I am,

Sincerely,

Joseph F. Rice  
PEC Co-Lead

JFR/ma

cc. Celeste Brustowicz, via email to [cbrustowicz@sch-llc.com](mailto:cbrustowicz@sch-llc.com)